

**REMARKS**

Claims 8-24 and 26-39 are pending in this application. In the Office Action dated September 27, 2004, the Examiner: (1) requested that the status of the related applications referenced in the specification be updated; (2) rejected claims 8, 12-15, 19-24, 26 and 30-39 under 35 U.S.C. § 103(a) as being unpatentable over Pal et al. (U.S. Patent No. 6,219,675); and (3) rejected claims 9-11, 16-18 and 27-29 under 35 U.S.C. § 103(a) as being unpatentable over Pal et al. in view of Hogan et al. (U.S. Patent No. 5,873,099). Applicants address each of these items in turn below.

*Related Applications*

The Examiner requests that the status of the related applications referenced in the specification be updated. In response to the Examiner's request, Applicants have amended the specification to supply the status of each referenced application.

*Section 103(a) Rejections*

Claims 8, 12-15, 19-24, 26 and 30-39 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Pal et al. Applicants respectfully traverse these rejections for at least the following reasons.

As to claims 8, 12, 19, 22, 23, 26, 30 and 37, the Examiner admits that Pal et al. fails to teach a "lookup service." Office Action (Sept. 27, 2004), p. 2, ll. 14-16. However, the Examiner asserts that "[i]t is well known to one [of] skill in the art that [a] lookup service ... is an obvious variation of the database ...." *Id.*, p. 2, ll. 16-18.

The Examiner neither cites a reference nor takes official notice to supply the teaching that a lookup service is an obvious variation of a database. Nevertheless, the Examiner asserts that it would have been obvious to modify Pal et al. to arrive at the claimed invention. However, Applicants traverse this assertion. "To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art." M.P.E.P. § 2143.03 (8th Ed., Rev. 1, Feb. 2003). Accordingly, Applicants respectfully request that the Examiner either cite a competent prior art reference to substantiate the Examiner's conclusion of obviousness, or else withdraw the rejection of these claims. See MPEP § 2144.03 (8<sup>th</sup> Ed., Rev. 2, May 2004) ("If Applicant adequately traverses the examiner's assertion [of "well known" prior art], the examiner must provide documentary evidence in the next Office action if the rejection is to be maintained.")

Moreover, to establish a *prima facie* case of obviousness, the Examiner must show some suggestion or motivation in the reference or in the general knowledge of those skilled in the art to modify the reference. *Id.* at § 2143.01. Even if the claimed lookup service is a modification of a database, as the Examiner asserts, the Examiner has shown no suggestion or motivation to modify the database management system of Pal et al. to produce a lookup service with associated services.

In light of the arguments presented above, Applicants respectfully submit that the Examiner's rejection of claims 8, 12-15, 19-26 and 30-39 is unsupported by the art relied upon. Accordingly, Applicants respectfully request that the rejection of these claims be withdrawn and the claims allowed.

As to claims 8, 22 and 26, the Examiner further alleges that “the claimed invention differed from the teachings of Pal et al. only by a degree, e.g., in the claimed lookup service and requesting notification particulars.” Office Action (Sept. 27, 2004), p. 2, l. 15-16. Thus, with respect to claims 8 and 26, the Examiner implicitly asserts that Pal et al. teaches “updating the lookup service such that services unaffected by the update continue to be available for use while the update occurs.” Further, with respect to claim 22, the Examiner implicitly asserts that Pal et al. teaches “a second client for utilizing the lookup service while the first client is updating the lookup service.” Applicants respectfully disagree with the Examiners interpretation of Pal et al.

In Pal et al., if one client computer (client 2 in Fig. 2) wishes to update a database object X that it shares with a second client (client 1), it sends a writelock request to navigational agent 208. Col. 6, ll. 46-48. After receiving the writelock request, navigational agent 208 sends a callback message to client 1 “to notify them that object X will *soon* be out of date.” See col. 6, ll. 57-67 (emphasis added). Client 1 “delays responding to the callback message until it has completed utilizing the object.” Col. 5, ll. 35-36. “After responding to the callback message, the client computer discards the database object, as it will *soon* become out of date.” Pal et al., col. 5, ll. 41-42 (emphasis added). “[T]he navigational agent does not allow an update of the database object until a reply to each callback message is received.” Pal et al., col. 5, ll. 52-55.

Consequently, in Pal et al., the client computer discards the database object before it is updated and may not utilize the database object again until after the update

is complete. Thus, even if a “lookup service ... is an obvious variation of the database” of Pal et al. (Office Action (Sept. 27, 2004), p. 2, ll. 17-18), which Applicants dispute, Pal et al. does not teach or even suggest “updating the lookup service such that services unaffected by the update continue to be available for use while the update occurs,” or “a second client for utilizing the lookup service while the first client is updating the lookup service.”

For at least these additional reasons, Applicants submit that the Examiner’s rejection of claims 8, 22 and 26 is not supported by Pal et al. Accordingly, Applicants respectfully request that the rejection of these claims under 35 U.S.C. § 103(a) be withdrawn and the claims allowed.

In regard to claims 12, 19, 23, 30 and 37, the Examiner maintains the assertion that “Applicant is broadly claiming that when a lookup service is updated, the requesting client should be notified but this is exactly an obvious variation of Pal et al. teaching of the callback message requesting a response when the client completed processing.” Office Action (Sept. 27, 2004), p. 3, ll. 5-7. However, Applicants respectfully disagree with the Examiner’s interpretation of the pending claims and disagree with the Examiners interpretation of Pal et al.

Contrary to the Examiner’s assertions, Pal et al. expressly teaches that the callback message does not “[request] a response when the client completed processing.” As explained above, in Pal et al., the callback message is sent from the navigational agent “to each of [the clients that currently have the database object X allocated] *other than the client requesting the writelock* ... to notify them that object X

will soon be out of date.” See col. 6, ll. 57-67 (emphasis added). The notified client “delays responding to the callback message until it has completed utilizing the object.” Col. 5, ll. 35-36. And “the navigational agent does not allow an update of the database object until a reply to each callback message is received.” Pal et al., col. 5, ll. 52-55. Therefore, the callback request and reply of Pal et al. does not teach or suggest a request to be notified when a lookup service is updated.

The Examiner also asserts that “It would have been obvious to one of ordinary skill in the ... art to write various variations of the callback taught by Pal et al. including callback requests originating from the client.” Office Action (Sept. 27, 2004), p. 4, ll. 10-13. The Examiner does not cite a reference to support this assertion. Applicant respectfully traverses the Examiner’s conclusion that it would have been obvious to one of ordinary skill to modify Pal et al. to arrive at the claimed invention, and requests that the Examiner either cite a competent prior art reference to support the Examiner’s conclusion of obviousness or allow the claims.

For at least these additional reasons, Applicants submit that the rejection of claims 12, 19, 23, 30 and 37 is unsupported by the art relied upon by the Examiner. Accordingly, Applicants respectfully request that the rejection of these claims under 35 U.S.C. 103(a) be withdrawn and the claims allowed.

Claims 12-15, 20, 21, 24, 31-36, 38 and 39 depend from one of claims 12, 19, 23, 30 and 37. As explained above, the rejection of claims 12, 19, 23, 30 and 37 is unsupported by Pal et al. Therefore, the rejection of claims 12-15, 20, 21, 24, 31-36, 38 and 39 is also unsupported by Pal et al. for at least the same reasons as those given

above with respect to claims 12, 19, 23, 30 and 37. Accordingly, Applicants respectfully request that the rejection of claims 12-15, 20, 21, 24, 31-36, 38 and 39 under 35 U.S.C. § 103(a) be withdrawn and the claims allowed.

Claims 9-11, 16-18 and 27-29 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Pal et al. in view of Hogan et al. Applicants respectfully traverse these rejections for at least the following reasons.

Claims 9-11, 16-18 and 27-29 depend from one of claims 8, 12 and 26. As explained above, the rejection of claims 8, 12 and 26 is unsupported by Pal et al. Moreover, Hogan et al. is not relied upon to teach, and, in fact, does not teach the above-noted deficiencies of Pal et al. Therefore, the rejection of claims 9-11, 16-18 and 27-29 is unsupported by Pal et al. and Hogan et al., whether taken alone or in combination. Accordingly, Applicants respectfully request that the rejection of these claims under 35 U.S.C. 103(a) be withdrawn and the claims allowed.

#### *Conclusion*

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

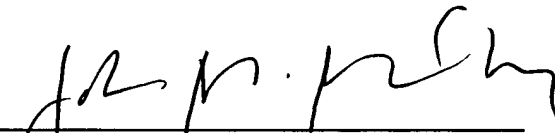
Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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Dated: December 23, 2004

By: \_\_\_\_\_

  
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